

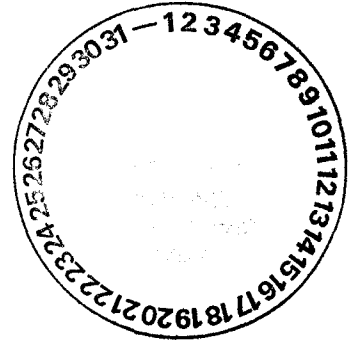


Los Angeles Refinery

1660 West Anaheim Street
Wilmington, CA 90744
Phone (310) 952-6000

September 30, 2008

South Coast Air Quality Management District
Refinery, Energy & RECLAIM Administration
21865 East Copley Drive
Diamond Bar, CA 91765-4182
Attention: Jay Chen



Subject: Public Comments on Proposed Title V Permit
ConocoPhillips LAR Wilmington Facility ID #800363

Dear Mr. Chen:

As part of the public review process, ConocoPhillips is providing comments on the proposed Title V permit for our Wilmington Plant dated July 31, 2008. We have made progress in resolving permit issues in advance of the issuance of the initial Title V permit for Wilmington. This letter and the enclosed documents set forth our remaining issues regarding the proposed Title V permit as issued for public comment.

ConocoPhillips has worked with the SCAQMD to obtain a permit that meets the intent of the Title V permit program. We appreciate the efforts that you and your staff have invested in the process to produce a consolidated, streamlined Title V permit. While many of our permit issues have been addressed, other important permit issues have not yet been resolved. This is partly due to the dynamic permitting and rule promulgation process in the SCAQMD, and to the fact that the SCAQMD has been challenged with the dual responsibility for managing both the draft Title V permit with newly imposed conditions and the RECLAIM Facility Permit for the Wilmington Plant as parallel efforts. Furthermore, the SCAQMD has been faced with difficult time limitations for issuance of Title V permits.

ConocoPhillips plans to submit permit applications in the near future to correct various permit issues, and a list of the issues is included in Attachment I. The issues pertain to, but are not limited to, the following:

- corrections to equipment descriptions
- corrections to permit conditions.

It is ConocoPhillips' understanding that permit applications that have been submitted and are being processed by the SCAQMD become part of the facility's compliance plan under Title V.

Other specific and general issues are addressed in ConocoPhillips Permit Appeal Case No. 4900-43 and the Submittal Package for Draft Title V Permit Letter sent on October 30, 2007 from Jay Churchill to Bob Sanford of SCAQMD.

By submitting these comments, ConocoPhillips does not waive and expressly reserves any and all legal remedies available to it with respect to the permit approval and implementation process. We do, however, look forward to resolution of our remaining issues in cooperation with the SCAQMD.

If you have any questions regarding this submittal, or require additional information, please contact Knut Beruldsen at 310-522-8037 or Staffany L Mishina at 310-952-6210.

Sincerely,



for Kristin N. Wisdom

Attachment

cc: Ms. Katherine Hoag
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA, 94105

ATTACHMENT I

LARW Draft Title V Permit

List of Permit Issues and Comments - September 30, 2008

List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
	Section D Issues						
1	N/A	N/A	N/A	N/A	N/A	Condition F52.1 is not needed since this regulation deals with fuels and additives.	Submit permit application and work with the SCAQMD to resolve the issue.
2	N/A	N/A	N/A	N/A	N/A	Condition S15.2 - Include Devices D1370 (Tk F 101), D1474 (Tk 326), D219 (Stripper reflux accumulator) in the list of equipment that vents to atmosphere.	Submit permit application and work with the SCAQMD to resolve the issue.
3	N/A	N/A	N/A	N/A	N/A	Condition S15.6 - Include the following new wording: "except Devices D659 (Tk 440) and D660 (Tk 441) that vent to the LPG Flare."	Submit permit application and work with the SCAQMD to resolve the issue.
4	N/A	N/A	N/A	N/A	N/A	Condition S18.2 - Add Systems P13:S4 (Pressure Tanks) and P14:S3 (Cogen) to the list of equipment that vents to the flare system.	Submit permit application and work with the SCAQMD to resolve the issue.
5	N/A	N/A	N/A	N/A	N/A	Condition S18.3 - Add Devices D659 (Tk 440) and D660 (Tk 441) to the list of equipment that vents to the LPG Flare.	Submit permit application and work with the SCAQMD to resolve the issue.
6	N/A	N/A	N/A	N/A	N/A	Condition S18.6 - Add Systems P9:S5 (Sour Water Stripping No. 1) & P9:S6 (Sour Water Stripping No. 2) to the list of equipment that vents to the affected devices.	Submit permit application and work with the SCAQMD to resolve the issue.
7	N/A	N/A	N/A	N/A	N/A	Condition S18.10 is superfluous if P13:S4 is added to Condition S18.2.	Work with SCAQMD on this issue.
8	1	1	D1503	FCCU Unit 152	Compressor GG-703	Move Device No. D1503 to System P1:S2 (Fractionation Section).	Work with SCAQMD to update the permit. Submit permit application if necessary.
9	1	1	D1674	FCCU Unit 152	Pot, Catalyst	Update condition D323.3 frequency from monthly to semi-annual per SCAQMD Periodic Monitoring Guidelines.	Continue to work with SCAQMD regarding Periodic Monitoring requirements.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
10	1	2	D22, D25, D30, D750, and two new device numbers need to be created for Accumulator F-651 and Vessel V-711	Fractionation Section	Column D-651A, Knock Out Pot F-12, Tank F-213, Vessel F-455, Accumulator F-651, Vessel V-711	Minor administrative changes to the equipment descriptions for the listed devices are needed. In addition, Accumulator F-651 and Vessel V-711 need to be added to the permit. A permit application to update the equipment description for Device D30 was submitted on 7/9/08 (A/N 485347).	Use open A/N 485347 to facilitate the requested changes to the system (ie, P1:S2).
11	1	4	D40	FCCU Unit 152 Heater	Heater 152-B-703	Remove condition D332.1, same as condition D328.1	Work with SCAQMD to update the permit. Submit permit application if necessary.
12	1	4	D42	FCCU Unit 152 Heater	Heater 152-B-202	Change Rerun Column to Depentanizer.	Work with SCAQMD to update the permit. Submit permit application if necessary.
13	2	6	D129	Hydrotreating Unit 59 Heaters	Heater 59-B-201	Change John Zink, Model PNDR-16 to PNDR-18M	Work with SCAQMD to update the permit. Submit permit application if necessary.
14	2	6	D194	Hydrotreating Unit 59 Heaters	Heater 59-B-101	Change 12 Burners to 8 Burners	Work with SCAQMD to update the permit. Submit permit application if necessary.
15	2	7	D133	Hydrotreating Unit 80 Heaters	Heater 79-B-201	Change John Zink, Model PNDR-16 to PNDR-20M	Work with SCAQMD to update the permit. Submit permit application if necessary.
16	2	8	D142	Hydrotreating Unit 89 Heaters	Heater 89-B-101	Change John Zink, Model PNDR-16 to PNDR-18M	Work with SCAQMD to update the permit. Submit permit application if necessary.
17	2	9	D148	Hydrotreating Unit 90 Heaters	Heater 90-B-203	Change John Zink, Model PNDR-16 to PNDR-20M	Work with SCAQMD to update the permit. Submit permit application if necessary.
18	2	10	D150	Hydrotreating Unit 100 Heaters	Heater 100-H-1	Change John Zink, Model PNDR-16 to PNDR-20M	Work with SCAQMD to update the permit. Submit permit application if necessary.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
19	2	10	D152	Hydrotreating Unit 100 Heaters	Heater 100-H-2	Change John Zink, Model PNDR-16 to PNDR-18M	Work with SCAQMD to update the permit. Submit permit application if necessary.
20	3	1	D1516	Catalytic Reforming Unit 80	Tank 80F-151	Change Trichloroethane to Perchloroethylene	Work with SCAQMD to update the permit. Submit permit application if necessary.
21	3	5	D161	Reforming Unit 100 Heaters	Heater 100-H-105	Change John Zink, Model PNDR-16 to PNDR-20M	Work with SCAQMD to update the permit. Submit permit application if necessary.
22	3	5	D163	Reforming Unit 100 Heaters	Heater 100-H-107	Change John Zink, Model PNDR-16 to PNDR-18M	Work with SCAQMD to update the permit. Submit permit application if necessary.
23	4	1	D206	Hydrogen Generation Unit 120	Column D-107	Change height from 53 ft to 48 ft and diameter from 14 ft 1 in to 13 ft. Application submitted to SCAQMD on 6/10/04 (A/N 431204).	SCAQMD is currently evaluating the permit application.
24	4	3	C221	Hydrogen Generation Unit 120 Heaters	Selective Catalytic Reduction System	The 20 ppmv ammonia slip limit is inappropriate since the original permit to operate did not include an emissions limit and there are not any SCAQMD rules and regulations that require such limit. An email requesting that the limit be removed was sent to SCAQMD on 9/26/08.	Work with SCAQMD to resolve this issue.
25	5	1	D1587	Hydrocracking Unit 120	Fugitive Emissions	Remove Condition I1.1 from the permit. This condition refers to variance which no longer applies. Email sent to SCAQMD on 9/26/08.	Work with SCAQMD to resolve this issue.
26	7	2	D355	H2SO4 Storage	Tank 5F-110	Out of service (OOS) Remove from permit.	Submit Permit Inactivation Form to SCAQMD.

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27	9	1		Gasoline Treating Unit 85		OOS Remove from permit. Permit Inactivation Form sent on 8/14/08.	Follow-up with SCAQMD regarding this issue.
28	10	1	B916, B917, B918, D1656	Sulfur Recovery Plt. No.1	Burner B-103, Burner B-104, Burner B-105, Condenser E-104	Add "Claus Unit" to P10:S1 title in order to be consistent with the title for P10:S4. Add "Natural Gas Fired" to the equipment descriptions for Burners B-103, B-104, and B-105. The vapors from the final condenser E-104 have always been vented to Tail Gas Unit No. 1. Therefore, add Device No. D425 to the "Connected To" column for condenser E-104.	Submit permit application and work with the SCAQMD to resolve the issues.
29	10	2	D425 and D919	Tail Gas Unit No.1, Reduction Control	Reactor B-107 and Generator B-107	For System 2, change the title to "Tail Gas Treating Unit No.1." For the B-107 equipment description, change "Reactor" to "Burner," and add "Parsons Burner, 5.1 MM Btu/hr" (reference, previous Command & Control permit). Regarding Generator B-107 (Device No. D919), remove this equipment because it's the same as B-107 (Device No. D425).	Submit permit application and work with the SCAQMD to resolve the issues.
30	10	3	C436	Sulfur Recovery Plt. No.1, Tail Gas Incinerator Unit	Incinerator B-108	Remove condition D328.1, same as condition D28.6.	Work with SCAQMD to update the permit. Submit permit application if necessary.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
31	10	4	B920, B921, B922, D439, D1652	Sulfur Recovery Plt. No.2	Burner B-203, Burner B-204, Burner B-205, Reactor D-201, and Condenser E-204	Add "Natural Gas Fired" to the equipment descriptions for Burners B-203, B-204, and B-205. Regarding the equipment description for Reactor D-201, remove D722 from the "Connected To" column. The vapors from the final condenser E-204 have always been vented to Tail Gas Unit No. 2. Therefore, add Device No. D448 to the "Connected To" column for condenser E-204.	Work with SCAQMD to update the permit. Submit permit application if necessary.
32	10	5	D448 and D1501	Tail Gas Unit No.2, Reduction Control	Reactor B-207 and Generator B-207	For System 5, change the title to "Tail Gas Treating Unit No.2." For the B-207 equipment description, change "Reactor" to "Burner," and add "Parsons Burner, 5.1 MM Btu/hr" (reference, previous Command & Control permit). Regarding Generator B-207 (Device No. D1501), remove this equipment because it's the same as B-207 (Device No. D448).	Work with SCAQMD to update the permit. Submit permit application if necessary.
33	10	6	C456	Sulfur Recovery Plt. No.2, Tail Gas Incinerator Unit	Incinerator B-208	Remove condition D328.1, same as condition D28.6	Work with SCAQMD to update the permit. Submit permit application if necessary.
34	12	2	D527 and C522	Sump and carbon adsorbers	Sump, Block 78 and Carbon Adsorber No.1	Change Block 78 to Block 68 and Change No. 1 to No.2	Submit permit application and work with the SCAQMD to resolve the issue.
35	13	1	D531	Fixed Roof Tanks	Storage Tank 210	Change Fuel Oil No. 6 to Firewater	Submit permit application and work with the SCAQMD to resolve the issue.
36	13	1	D535	Fixed Roof Tanks	Storage Tank 327	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
37	13	1	D536	Fixed Roof Tanks	Storage Tank 328	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.
38	13	1	D540	Fixed Roof Tanks	Storage Tank F-108	Out of service (OOS) Remove from permit.	Permit Inactivation Form sent on 9/24/08.
39	13	1	D541	Fixed Roof Tanks	Storage Tank F-321A	OOS Remove from permit.	Permit Inactivation Form sent on 9/24/08.
40	13	1	D542	Fixed Roof Tanks	Storage Tank F-321B	OOS Remove from permit.	Permit Inactivation Form sent on 9/24/08.
41	13	1	D543	Fixed Roof Tanks	Storage Tank 336	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.
42	13	1	D1436	Fixed Roof Tanks	Storage Tank F-327	Same as device D1709 in (P7:S8). Remove one from permit.	Submit permit application and work with the SCAQMD to resolve the issue.
43	13	1		Fixed Roof Tanks	Storage Tank 294	Add this equipment to the permit.	Application sent 10/17/01. SCAQMD permit engineer requested Admin Change application for blower C3780 "Connected To" Tk294,327 & 328.
44	13	2	D599	External Floating Roof Single-Seal Tanks	Storage Tank 71	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.
45	13	2	D600	External Floating Roof Single-Seal Tanks	Storage Tank 72	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
46	13	2	D617	External Floating Roof Single-Seal Tanks	Storage Tank 278	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.
47	13	2	D622	External Floating Roof Single-Seal Tanks	Storage Tank 350	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.
48	13	2	D637	External Floating Roof Single-Seal Tanks	Storage Tank 445	Change Metallic Shoe to Wiper	Submit permit application and work with the SCAQMD to resolve the issue.
49	13	2	D360	External Floating Roof Single-Seal Tanks	Storage Tank 405	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
50	13	3	D547	External Floating Roof Tanks	Storage Tank 4	Remove from permit, in Boiler Feed Water service.	Submit Permit Inactivation Form to SCAQMD.
51	13	3	D548	External Floating Roof Tanks	Storage Tank 5	Remove from permit, in Boiler Feed Water service.	Submit Permit Inactivation Form to SCAQMD.
52	13	3	D549	External Floating Roof Tanks	Storage Tank 6	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
53	13	3	D553	External Floating Roof Tanks	Storage Tank 62	Incomplete equipment description (tank mixer)	Submit permit application and work with the SCAQMD to resolve the issue.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
54	13	3	D555	External Floating Roof Tanks	Storage Tank 66	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
55	13	3	D565	External Floating Roof Tanks	Storage Tank 124	Add LCO/Cutter/Diesel Distillate to description.	Submit permit application and work with the SCAQMD to resolve the issue.
56	13	3	D568	External Floating Roof Tanks	Storage Tank 148	Remove mixer. Change capacity from 95180 BBL to 100800 BBL and height from 51 ft 3 in to 50 ft 10 in	Submit permit application and work with the SCAQMD to resolve the issue.
57	13	3	D586	External Floating Roof Tanks	Storage Tank 3	Add commodity (recovered oil) to the equipment description.	Submit permit application and work with the SCAQMD to resolve the issue.
58	13	3	D602	External Floating Roof Tanks	Storage Tank 337	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
59	13	3	D615	External Floating Roof Tanks	Storage Tank 370	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
60	13	3	D626	External Floating Roof Tanks	Storage Tank 452	Remove condition H23.16 (Subpart K) Change capacity from 162100 BBL to 145000 BBL and height from 51 ft 6 in to 50 ft 11 in	Work with SCAQMD to update the permit. Submit permit application if necessary.
61	13	3	D629	External Floating Roof Tanks	Storage Tank 453	Remove condition H23.16 (Subpart K).	Work with SCAQMD to update the permit. Submit permit application if necessary.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
62	13	3	D356	External Floating Roof Tanks	Storage Tank 401	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
63	13	3	D357	External Floating Roof Tanks	Storage Tank 402	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
64	13	3	D359	External Floating Roof Tanks	Storage Tank 404	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
65	13	3	D361	External Floating Roof Tanks	Storage Tank 406	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
66	13	3	D362	External Floating Roof Tanks	Storage Tank 407	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
67	13	3	D363	External Floating Roof Tanks	Storage Tank 408	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
68	13	3	D364	External Floating Roof Tanks	Storage Tank 410	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
69	13	8	D546	Dome Covered External Floating Roof Tanks	Storage Tank 1	Change HAP from Group 1 to Group 2. Update condition C1.65 to language similar to condition C1.69 for consistency.	Work with SCAQMD to update the permit. Submit permit application if necessary.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
70	13	8	D556	Dome Covered External Floating Roof Tanks	Storage Tank 67	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
71	13	8	D567	Dome Covered External Floating Roof Tanks	Storage Tank 147	Remove condition H23.16 (Subpart K)	Work with SCAQMD to update the permit. Submit permit application if necessary.
72	13	8	D571	Dome Covered External Floating Roof Tanks	Storage Tank 169	Remove "With a 15 HP Side Entry Mixer" from the equipment description. Update condition C1.67 to language similar to condition C1.69 for consistency.	Work with SCAQMD to update the permit. Submit permit application if necessary.
73	13	9	D665	Low Pressurized Tanks	Storage Tank 304	Change HAP from Group 1 to Group 2.	Work with SCAQMD to update the permit. Submit permit application if necessary.
74	14	2	D669	Non Emergency IC Engines	ICE Diesel Fuel, Ford, Model 380	Remove condition D28.11 (PM testing). Not required by Periodic Monitoring Guidelines.	Review Periodic Monitoring Requirements with SCAQMD. Submit permit application if needed.
75	14	2	D670	Non Emergency IC Engines	ICE Diesel Fuel, Caterpillar Model 3306A	Remove condition D28.11 (PM testing). Not required by Periodic Monitoring Guidelines.	Review Periodic Monitoring Requirements with SCAQMD. Submit permit application if needed.
76	14	2	D671	Non Emergency IC Engines	ICE Diesel Fuel, Perkins Model	Remove condition D28.11 (PM testing) Not required by Periodic Monitoring Guidelines.	Review Periodic Monitoring Requirements with SCAQMD. Submit permit application if needed.
77	14	2	D674	Non Emergency IC Engines	ICE Diesel Fuel, John Deere Model 4-239TL	Remove condition D28.11 (PM testing) Not required by Periodic Monitoring Guidelines.	Review Periodic Monitoring Requirements with SCAQMD. Submit permit application if needed.

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78	14	3	D826	Cogeneration	Evaporator E-107	Regarding the equipment description, change "Evaporator" to "Vaporizer."	Work with SCAQMD to update the permit. Submit permit application if necessary.
79	14	3	D828	Cogeneration	Turbine GG-101	Condition K67.5 is no longer applicable because an Alternative Monitoring Plan (AMP) was submitted to EPA (3/31/05).	Work with SCAQMD regarding this issue. Submit application if necessary.
80	14	3	D829	Cogeneration	Boiler E-102	Condition K67.5 is no longer applicable because an AMP was submitted to EPA (3/31/05).	Work with SCAQMD regarding this issue. Submit application if necessary.
81	14	3		Cogeneration	Vessel F-117	Add Vessel F-117 to the permit. This equipment was included in the previous Command & Control permit.	Work with SCAQMD regarding this issue. Submit application if necessary.
82	16	2	C695	Dust Collector	Baghouse	Update condition D381.1 monitoring frequency from quarterly to semi-annual per SCAQMD Periodic Monitoring Guidelines.	Work with SCAQMD regarding this issue. Submit application if necessary.
83	17	7	D733	Vapor Recovery System (South)	Compressor GB-152	Regarding the equipment description, change electric motor rating from 400-HP to 228-HP.	Work with SCAQMD regarding this issue. Submit application if necessary.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
Section H Issues							
84	2	3	D1376	Mid-Barrel Hydrotreater Unit 89	Pump 89-G-114	Regarding the equipment description, change 5-HP to 7.5-HP.	The open A/N is 327360. Work with SCAQMD to have the requested minor change incorporated into the permit to operate.
85	2	4	D1495	Diesel Hydrotreater Unit 90	Pump 90-G-201	Remove "With Tandem Mechanical Seals" from the equipment description.	The open A/N is 423384. Work with SCAQMD to have the requested minor change incorporated into the permit to operate.
86	4	2	D764, D765, D772, D790	Hydrogen Generation Unit 118	Reactor 118-R-404A, Reactor 118-R-404B, Reactor 118-V-406, and Vessel 118-ME-405	Regarding the equipment descriptions for Reactors 118-R-404A and 118-R-404B, change height from 1 ft 8 in to 20 ft. Regarding Reactor 118-V-406, change "Reactor" to "Vessel" and length from 2 ft to 24 ft. Vessel 118-ME-405 is OOS and should be removed from the permit.	The open A/N is 451293. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
87	5	1	D1437, D1438, D1442	Hydrocracking Unit 120	Compressor 120-GB-203A, Compressor 120-GB-203B, Knock Out Pot 120-F-255B	Regarding Compressor 120-GB-203A, this equipment is the same as Device D250 in Section D. Remove one device. Regarding Compressor 120-GB-203B, this equipment is the same as Device D251 in Section D. Remove one device. Regarding Knock Out Pot 120-F-255B, remove from permit per condition F25.1.	The open A/N is 326121. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.

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88	6	1	D291, D292, D1589	Alkylation Unit 110	Tank F-11, Drum F-12, Fugitive Emissions	Regarding the equipment description for Tank F-11, change "Isobutane" to "Acid Blowdown Drum" and length from 40 ft to 60 ft. Regarding the equipment description for Drum F-12, change "Blowdown" to "Butane KO Drum" and length from 15 ft to 8 ft and diameter from 5 ft to 4 ft. Regarding fugitive emissions, Condition H23.2 is missing and should be put back to the permit.	The open A/N is 411097. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
89	7	1	D331, D333, D334, D338, D339, D340, C341, D342, D343, D1523, D344, D348, D349, D350, D1402, D1403, D1404, D1405, D1408, D1409	Sulfuric Acid Production Unit 141	Boiler 5B-101, Reactor B-104, Mist Eliminator 5D-101, Vessel D-105, Tower 5D-106, Column 5D-107, Mist Eliminator 5D-109, Tank F-202, Tank 5F-102, Tank 5F-103, Tank 5F-104, Accumulator F-119, Pot F-145, Mist Eliminator, Injector No.1, Injector No.2, Injector ME-105A, Injector ME-105B, Injector ME-106A, Injector ME-106B	Boiler 5B-101: Should be Boiler B-101. Reactor B-104: Remove D814 from "Connected To" column. Mist Eliminator 5D-101: OOS Remove from permit. Column D-105: Remove C353 from "Connected To" column. Tower 5D-106: OOS Remove from permit. Column 5D-107: Should be Column D-107. Mist Eliminator 5D-109: OOS Remove from permit. Tank F-202: Add D336 to "Connected To" column. Tank 5F-102: Remove 5 from 5F-102 and C341 from "Connected To" column, and add D336 to "Connected To" column. Tanks 5F-103, 5F-104, and Accumulator F-119: OOS Remove from permit. Pot F-145: Replace Width, Height and Length with Diameter = 4 ft 6 in. Mist Eliminator: OOS remove from permit. Injectors (D1402 and D1403): Replace "Injector" with "Burner." Injectors ME-105A and ME-105B: Duplicate of D1402 and D1403, remove from permit. Injectors ME-106A and ME-106B: OOS Remove from permit.	The open A/N is 389085. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
90	7	3	D352, D354, C353	Cansolv Sox Scrubbing	Scrubber D-120, Column D-121, Mist Eliminator F-115	Change title of System 3 to "Tail Gas Treating Unit" for H2SO4 Plant. Scrubber D-120: Remove "Mist Eliminator" and add C353 to "Connected To" column. Column D-121: OOS Remove from permit. Mist Eliminator F-115: Remove D338 from "Connected To" column and add D352 & D335.	The open A/N is 389083. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
91	7	4	D1675 and C1545	Vapor Recovery System (Blowers & Scrubber)	Blower GB-105 & GB-106, Scrubber F-404	Blower GB-105 & GB-106: Add "Spent" before "Acid Loading Rack." Scrubber F-404: Change 30 gpm to 10 gpm	The open A/N is 425342. Work with SCAQMD to have the requested minor change incorporated into the permit to operate.
92	7	8	D1688, D1709, D1713	Cansolv (Amine) Regeneration	Condenser E-601, Tank F-327, Tank F-401	System 8 title: Remove "Cansolv" from title. Condenser E-601: Remove "Solvent Stripper" and replace with "Regenerator Overhead." Tank F-327: Already in permit as Device No. D1436 in P13:S1 (remove one from the permit). Tank F-401: Remove C1545 from "Connected To" column.	The open A/N is 424946. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
93	9	4	D398, D399, D405	Amine Stripping Unit 138	Reactor D-1, Reactor D-301, Tank F-304	Change Title of System 4 to "Amine Regeneration Unit 138." Change "Reactivator" to "Regenerator" for Reactors D-1 and D-301. For Tank F-300, change "Rich MEA" to "Rich Amine."	The open A/N is 351957. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
94	11	7	D1380	Spent Sulfuric Acid Loading/Unloading	Loading and Unloading Arm, Tank Truck	For System 7: Remove "Unloading" from the title. For Device D1380: Change diameter from 4 in to 3 in and add D333 & D1545 to "Connected To" column.	The open A/N is 378283. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
95	11	8	D1385	Sulfur Loading	Loading Arm, Top	Add D333 & D1545 to "Connected To" column.	The open A/N is 336592. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
96	12	1	D499, D501, D502, D504, D508, D512, D513, D514, D515, D516, D517, D518, D1543, D1544, D1624, D1647	Wastewater Treatment	Tank F-2A, Tank F-2C, Floatation Unit F-3A, Floatation Unit F-3C, Sump, Tank 436, Tank 437, Tank 438, Tank 439, Tank 461, Tank 462, Tank F-8, Oil Water Separators F-1A & F-1B, Tank OB Diversion Box, Drain System Component.	Minor administrative changes to the equipment descriptions are needed. In addition, some of the equipment is OOS and needs to be removed from the permit. Also, some of the equipment is incorrectly tagged with Subpart CC requirements.	The open A/N is 366270. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
97	13	7	D661	Butane Tanks (Venting to LPG Flare)	Storage Tank 442	Change capacity from 840000 BBL to 931900 BBL.	The open A/N is 378414. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
98	13	7	D662	Butane Tanks (Venting to LPG Flare)	Storage Tank 443	Change capacity from 840000 BBL to 931900 BBL.	The open A/N is 378419. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
99	13	8	D570	Dome Covered External Floating Roof Tanks	Storage Tank 168	Change Category C or Better per Rule 219(c)(4), Wiper Type to Category B. Change Guidepole from Unslotted to Slotted.	The open A/N is 467210. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.

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List #	Process	System	Device	Unit Descrip	Equipment	Issue	Comments
100	15	1	D686	Boilers	Boiler No.7	Add C1773 to "Connected To" column.	The open A/N is 460501. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
101	15	1	C1773	Boilers	SCR	Add D686 to "Connected To" column.	The open A/N is 460547. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
102	17	2	D725, D726, D727, D730, D1554, D734, D834, D835, D837	South Flare	Tank F-151, Knock Out Pot F-152, Pot F-1, Tank F-154, Compressor GB151, Knock Out Pot F-156, Pot F-1A, Pot F-1B, Knock Out Pot F-155	Tank F-154 should be removed from the permit and the rest of the equipment should be moved to P17:S7 (VAPOR RECOVERY SYSTEM, SOUTH).	The open A/N is 334427. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
103	17	6	D721, D1616, D833, D1355	Vapor Recovery System (North)	Vessel F-231, Fugitive Emissions, Knock Out Pot F-148, Knock Out Pot 118-V-410	Vessel F-231: Move to P6:S1. Fugitive Emissions: Condition H23.2 is missing and needs to be added to the permit. Knock Out Pot F-148: Move to P7:S1. Knock Out Pot 118-V-410: Move to P4:S2.	The open A/N is 406317. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.
104	18	1	D841, D846, D849	Isomerization, Penex Plus Unit 60	Dryer 60-F-133A/B, Vessel 60-F-132, Vessel 60-D-105	Dryer 60-F-133A/B: Add length: 13 ft 6 in and diameter: 3 ft. Vessel 60-F-132: Change diameter from 100 ft 6 in to 9 ft. Vessel 60-D-105: Change height from 34 ft to 64 ft.	The open A/N is 326166. Work with SCAQMD to have the requested minor changes incorporated into the permit to operate.